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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9 **WESTERN DIVISION**

10 CENTER FOR BIOLOGICAL
11 DIVERSITY, et al.,

12 *Plaintiffs,*

13 v.
14

15 DOUG BURGUM, et al.,

16 *Defendants,*

17 SABLE OFFSHORE CORP.,
18

19 *Intervenor-Defendant.*
20

Case No. 2:24-cv-05459-MWC-MAA

**DECLARATION OF
BLAKE KOPCHO**

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1 I, Blake Kopcho, declare as follows:

2 1. I have personal knowledge of the statements in this declaration, and I
3 could and would competently testify to these matters if called as a witness.

4 2. I have been a member of the Center for Biological Diversity since
5 2015, the same year I joined its staff. Although I left my staff position at the Center
6 in 2019, I am still an active member and supporter of the organization. I share the
7 Center's mission to protect all living creatures and their habitats, and I trust it to
8 represent my interests and values.

9 3. I grew up in the coastal town of Rancho Palos Verdes and often spent
10 time on the water and at the beach throughout Southern California, as my parents
11 have a beach house in Newport Beach and my grandmother lives in Huntington
12 Beach. These experiences led to a life-long love for the ocean and marine animals,
13 and this love steered the direction of many aspects of my life—my educational
14 pursuits, hobbies, and professional career.

15 4. I love to surf, scuba dive, sail, and spend other time in and around the
16 ocean, and it is no exaggeration to say my quality of life depends on the quality of
17 its waters. I've lived in Santa Barbara since 2020, and as someone who lives and
18 recreates in the constant view of both natural beauty and offshore oil platforms, the
19 worry of an oil spill is never far from my mind.

20 5. I received a bachelor's degree in aquatic biology from U.C. Santa
21 Barbara in 2007 and a master's degree in marine biology from the University of
22 Auckland, New Zealand, in 2011. My post-graduate work in New Zealand focused
23 on marine ecology and evolutionary biology, with a year of intensive field work
24 and studies on the nutritional ecology of herbivorous marine fish. I also
25 participated in a semester abroad program focused on biological oceanography at
26 Woods Hole Oceanographic Institution in 2008. During that time, I sailed for six
27 weeks from Hawaii to Tahiti, assisting with navigation and sailing duties along the
28 way, as well as data collection to study the equatorial undercurrent. These

1 experiences gave me a deeper understanding and appreciation of the interactions
2 and interdependence of everything in the ocean—from currents to seaweed and
3 from plankton to whales.

4 6. I started surfing when I was 14 and it has grown into a self-described
5 obsession. The act of riding waves is a big part of the attraction of course, but
6 another big part is just being in the ocean. I enjoy sitting on my surfboard,
7 watching the pelicans, dolphins, and occasional sea otter, and experiencing the
8 colors and textures of the water. It is something that not only improves my physical
9 health but my mental health as well, giving me time to reconnect with the natural
10 world and forget about the stress and busyness of the day. These psychological,
11 emotional, and physical benefits from surfing are essential to my well-being.

12 7. I regularly surf and spend time on the beaches near Santa Barbara and
13 along the Gaviota Coast, including places like Jalama Beach near Point
14 Conception, Refugio State Beach, El Capitán State Beach, Naples State Marine
15 Conservation Area, Sands Beach, Rincon Beach, Oxnard Shores, and Silver Strand
16 State Beach, to name a few. I have surfed up and down the entire California coast
17 and off the Channel Islands as well. I surf as often as possible—daily if the waves
18 are good—between Ventura and Jamala Beach, north of Point Conception. The
19 Gaviota Coast is particularly special to me because so much of it is undeveloped,
20 and I love hiking and surfing in places where I am surrounded by undisturbed
21 natural beauty.

22 8. One of my favorite places to go is the Channel Islands. I go between
23 once and three times a year to sail, scuba dive, surf, freedive, camp, and hike with
24 family and friends, and it is something I always look forward to. I visited Santa
25 Cruz Island three times last year and once in 2022, and twice in 2021; I also visited
26 Santa Rosa Island in 2023 for a backpacking trip with friends. I just went out to
27 Santa Cruz Island this week. We surfed all day and then spent some time with a
28 small pod of humpback whales on the way back to Santa Barbara. While on the

1 Channel Islands, I enjoy looking for sea anemones, sea stars, urchins, abalone, and
2 octopuses in tidepools, and watching the wildlife that live around the islands,
3 including elephant seals, harbor seals, fur seals, sea lions, and island foxes. My
4 most memorable trip was in 2005, when I went with a group of friends to Santa
5 Rosa Island and spent eight days camping and hiking. Although we did some of the
6 most hard-core hiking and surfing I've ever done, ran out of food, and were
7 exhausted, the boat ride back made everything worthwhile: we saw a pod of
8 endangered blue whales and were incredibly fortunate to see a blue whale fluke,
9 which is very rare since they are so massive and do not usually dive deep enough
10 for their tails to emerge from the water. We also saw a superpod of common
11 dolphins numbering between 500 and 1,000 individuals, with dolphins swimming
12 in every direction I looked and as far as my eye could see. It was a highlight of my
13 life and an experience I will never forget.

14 9. I have not seen blue whales since that 2005 trip, but I love to sail on
15 the Santa Barbara Channel, and I look for them and other whales every time I am
16 on the water. I enjoy seeing all the different marine animals that migrate through
17 the area or call the Channel home, including humpbacks, common dolphins, and
18 bottlenose dolphins. This last February, I was boating with friends off the coast of
19 Santa Barbara and saw a large pod of orcas in the Channel, including several
20 calves and a semi-albino juvenile known as Frosty. There were about a dozen in
21 all, and we were able to watch them for hours. It was an incredible encounter and
22 something I hope to experience again and again. I also enjoy watching osprey,
23 snowy plovers, and other shorebirds at the beach, and I recently saw a bald eagle
24 for the first time at Anacapa Island.

25 10. I sometimes charter a boat with friends and sail out to the Channel Islands,
26 loading up the boat with gear and sleeping on it for three or four days. One of my
27 favorite memories is chartering a sailboat with my parents in September 2019,
28 when we sailed around the Channel Islands for three days and saw native foxes

1 while hiking on Santa Rosa Island. Some of my friends now have boats of their
2 own so I'm able to visit the Channel Islands more often, and I plan to continue
3 doing these trips long into the future.



16 One of the orcas I saw just offshore of Santa Barbara
17 while boating with friends in February 2025

18 11. I am also a scuba diver, which is something I started in college and
19 enjoy doing around the Channel Islands. The last time I went was in 2023, when I
20 did two or three dives from Santa Cruz Island. My favorite time to dive is in the
21 late summer or early fall, when visibility is best. I have done 20 or more dives
22 around the islands over the last 20-plus years. I am fascinated by the richness and
23 diversity of life found there and have seen some incredible things, including a giant
24 moray eel, baby horn shark, schools of bat rays, garibaldi, damselfish, lots of
25 different reef fish, mola mola (a type of sunfish), spiny lobster, sea hares,
26 nudibranchs, and black, green, and red abalone. The Channel Islands are the gem
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1 of California's Gold Coast. Having access to this remarkable place is one of the
2 main reasons I live here.

3 12. I also enjoy standup paddle-boarding, swimming, and freediving
4 along the coast, diving as deep as possible and swimming through kelp forests. I
5 became fascinated with all types of seaweed from my time spent studying
6 herbivorous fish and their diets for my master's thesis, and I appreciate everything
7 about them—the way they look and feel, and the critical role they play in
8 temperate marine ecosystems. They play a similar role in temperate water as coral
9 reefs do in the tropics, providing habitat and food for a wide range of marine life.

10 13. Many of the best moments of my life have been spent surfing, sailing,
11 and diving in the Santa Barbara Channel. Its beauty and biodiversity inspire and
12 move me. These activities are a central part of my life—and whether it be boating,
13 surfing, swimming, diving, or just enjoying time at the beach, I am on or in the
14 Pacific on a near-daily basis. I will continue doing these activities as often and as
15 long as possible, and an oil spill would have devastating, long-lasting impacts on
16 the marine life and environment that mean so much to me.

17 14. I am reminded every time I see offshore oil platforms on the horizon,
18 or sail past them on my way to the Channel Islands, that another oil spill could
19 happen any time. In fact, after the egregious spill caused by a corroded pipeline
20 carrying oil from the Santa Ynez Unit in 2015, I urged my former co-workers at
21 the Center to fight any resumption of oil and gas drilling because of the dangers it
22 poses. I am incredulous that officials extended the leases and issued approvals
23 related to restarting operations without considering the environmental impacts.
24 These pipelines and associated infrastructure are in sensitive areas of the Gaviota
25 coast, and another oil spill seems inevitable if these corroded pipelines are put back
26 into use. This is especially true considering how old all of the Santa Ynez Unit
27 offshore and onshore infrastructure is and the fact that the onshore pipelines have
28 already ruptured once.

1 15. Restart of these oil operations would cause me irreparable harm from
2 the air pollution, water pollution, and risk of another oil spill that would bring.
3 Another oil spill could cause further damage to the intertidal zone and the health of
4 everything I see in the underwater world—from sea hares to blue whales. Oil spills
5 have serious long-term ecological effects. The animals who survive a spill face
6 chronic health and reproductive problems, and the marine environments damaged
7 by a spill take years or even decades to recover.

8 16. On a kayaking trip in May of last year, I encountered a population of
9 sea otters who live in a large kelp bed just south of Point Conception, where they
10 are starting to make a comeback. I kept my distance so as not to disturb them, and
11 it was an amazing experience to watch them swim and play. It looked like there
12 were dozens of them, spreading across an area about three to four football fields in
13 length. I believe this is the only relatively robust population this far south in
14 California, which makes them particularly special. These otters are very close to
15 the Santa Ynez Unit platforms and onshore and offshore pipelines, and a large spill
16 would be devastating to this population. There are images forever imprinted in my
17 memory of pelicans covered in oil and dead dolphins on the beach from both the
18 Deepwater Horizon spill, which happened in the Gulf of Mexico in 2010, and the
19 2015 Refugio spill. It would break my heart if the same thing happened to these
20 otters.

21 17. I also think about the bald eagles and ospreys I've seen along the
22 coast. They're usually hunting close to shore where they can see fish in the shallow
23 water. An oil spill from the Santa Ynez Unit would kill or poison their prey and
24 impact their ability to hunt. Likewise, the snowy plovers I see also nest in the
25 dunes and hunt in the intertidal zone. Their reproduction, nesting, and feeding
26 could all be irreparably harmed by another spill.

27 18. An oil spill could also harm my own health and safety. I've seen oil—
28 often in big globbs—on so many beaches, including beaches in Goleta, Santa

1 Barbara, Montecito, Summerland, and Carpinteria. It smells terrible, sticks to your
2 feet and surfboard, and is incredibly difficult to remove. One time at Leadbetter
3 Beach, there was so much tar that I had to cancel my plans for a beach walk; after
4 fewer than five minutes of walking on the beach, the bottom of my feet were
5 completely covered in a thick, foul-smelling layer of tar. Although there are natural
6 oil seeps in the region, constant leaks and spills from offshore drilling contributes
7 to these impacts. I've personally seen an oil slick in the Santa Barbara Channel
8 from the air when flying into the Santa Barbara Airport. Another oil spill from the
9 Santa Ynez Unit would prevent me from engaging in activities that are so
10 meaningful to me—including swimming, diving, surfing, and boating—for a long
11 time. It would be devastating for the entire community.

12 19. The restart of these operations also will impact air and water quality
13 where I live and recreate. I know that when they were operating, the processing
14 facilities for the Santa Ynez Unit were a major source of air pollutants known to
15 cause a range of health problems—including nitrogen dioxide and gases that
16 produce smog. Extending the leases and granting the permits helps clear the way
17 for operations to restart at these facilities, which would adversely affect the air I
18 breathe since I live in Santa Barbara and take part in outdoor recreational activities
19 near the facilities on a near-daily basis.

20 20. The Santa Ynez Unit was also the largest source of greenhouse gas
21 emissions in Santa Barabara County, which runs counters to my efforts and work
22 to reduce the effects of climate change. The lease extensions and permits also
23 further our dependency on fossil fuels when we should be ending this dependency
24 altogether. We are barreling towards a climate catastrophe, and science shows we
25 need to stop new oil projects and decommission existing ones. We've already
26 reached 1.5°C warming, and 2°C appears inevitable. We need to take dramatic
27 action to avoid the worst consequences of climate change, and extending these
28 leases and issuing these permits takes us in the wrong direction—prolonging our

1 use of fossil fuels and worsening the effects of climate change that have real-life
2 consequences for me—causing sea level rise that endangers beaches where I hike,
3 altering currents and wave patterns that threaten some of my favorite surf breaks,
4 and wiping out habitat of the animals I enjoy viewing and studying. These are
5 activities I will do as long as I can, but I worry the effects of climate change—not
6 age—will determine how long they are possible.

7 21. Environmental impacts including air pollution, water pollution, vessel
8 impacts, and the very real risk of another catastrophic oil spill exist as long as there
9 are active oil leases in the Santa Ynez Unit. My interests in swimming, surfing,
10 sailing, diving, and studying marine life are harmed every day the leases in the
11 Santa Ynez Unit are in effect. These interests are not just recreational, they are an
12 intrinsic part of who I am and critical to my well-being. The leases for the old
13 platforms, pipelines, and wells in the Santa Ynez Unit should be retired and
14 decommissioned, not extended year after year with no environmental review.
15 BSEE's approval of these extensions and permits and refusal to conduct an
16 environmental analysis puts my health, safety, and well-being at risk. A court order
17 requiring the agency to carefully look at the impacts of its actions and these oil and
18 gas operations before it makes any decisions toward a restart would protect my
19 health, values, and interests.

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21 I declare under penalty of perjury under the laws of the State of California
22 that the foregoing is true and correct to the best of my personal knowledge,
23 information, and belief.

24
25 Executed on April 30, 2025



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27 Blake Kopcho
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